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12 *Attorneys for Defendants*

13  
 14 **UNITED STATES DISTRICT COURT**  
 14 **DISTRICT OF NEVADA**

15 THE DANIELS FAMILY 2001 REVOCABLE  
 16 TRUST, Individually and On Behalf of All  
 16 Others Similarly Situated,

17 Plaintiff

18 v.

19 LAS VEGAS SANDS CORP., DR. MIRIAM  
 20 ADELSON, in her capacity as Special  
 20 Administrator of the estate of SHELDON  
 21 G. ADELSON, PATRICK DUMONT, and  
 21 ROBERT G. GOLDSTEIN,

22 Defendants

Case No.: 2:20-cv-01958-CDS-EJY

23  
 24 **STIPULATION REGARDING**  
 24 **DISMISSAL WITH PREJUDICE**  
 24 **AND ENTRY OF FINAL JUDGMENT**

25 Defendants Las Vegas Sands Corp., Dr. Miriam Adelson, in her capacity as Special  
 26 Administrator of the Estate of Sheldon G. Adelson, Patrick Dumont, and Robert G. Goldstein  
 26 (“Defendants”) and Lead Plaintiffs Carl S. Ciaccio and Donald M. DeSalvo (collectively,  
 27 “Plaintiffs,” together with Defendants, “the Parties”) stipulate that the January 18, 2024 deadline  
 28 for Plaintiffs to file a Third Amended Complaint has passed and that the Court should issue an

1 order dismissing Plaintiffs' claims with prejudice and enter final judgment in a separate document.

2 *See Fed. R. Civ. P. 58(d).* The Parties further state as follows:

3       1. On December 19, 2023, after hearing oral argument from the Parties, the Court  
4 issued a Minute Order granting Defendants' Motion for Reconsideration. ECF No. 146.

5       2. On January 2, 2024, the Court issued an Amended Order Regarding Plaintiffs'  
6 Motion for Reconsideration, Defendants' Motion to Dismiss the Second Amended Complaint, and  
7 the Parties' Leave to File Supplemental Authority. ECF No. 147 (the "Amended Order"). The  
8 Amended Order dismissed the Second Amended Complaint in its entirety and provided that if  
9 Plaintiffs chose to file a Third Amended Complaint, they needed to do so within 30 days of  
10 December 19, 2023, *id.* at 24, which set a deadline to file a Third Amended Complaint of January  
11 18, 2024.

12       3. On January 18, 2024, Plaintiffs informed Defendants by e-mail that they would not  
13 be filing a Third Amended Complaint, and Plaintiffs have not since filed a Third Amended  
14 Complaint and do not intend to do so.

15       4. The Parties therefore agree that dismissal of Plaintiffs' claims with prejudice is  
16 appropriate, and that each party shall bear their own attorneys' fees and costs associated with this  
17 action.

18       5. For the avoidance of doubt, the Parties note that, since no class has been certified in  
19 this action, no claims of absent class members are at issue and therefore this dismissal is without  
20 prejudice as to the claims of any absent class member.

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1 For the foregoing reasons, the Parties respectfully request that the Court issue an order  
 2 dismissing Plaintiffs' claims with prejudice with each party to bear their own attorneys' fees and  
 3 costs, and enter final judgment in a separate document. *See* Fed. R. Civ. P. 58(d).

4

5 Dated: February 22, 2024

6 **ALDRICH LAW FIRM, LTD.**

7 By: /s/ Shannon L. Hopkins

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19 **SNELL & WILMER, L.L.P.**

20 By: /s/ Patrick G. Byrne

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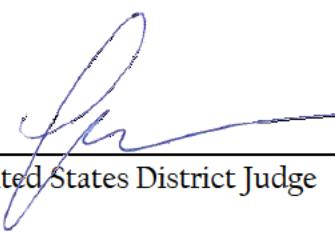
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31 *Attorneys for Defendants*

32 **ORDER**

33 Based on the parties' stipulation, this case is dismissed with prejudice as to plaintiff The  
 34 Daniel Family 2001 Revocable Trust, with each party to bear its own costs and fees. No class  
 35 has been certified in this action, thus this dismissal has no preclusive effect on the claims of  
 36 absent class members.

37 The Clerk of Court is kindly instructed to enter judgment in favor of defendants, and to  
 38 close this case. IT IS SO ORDERED.



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